

5/10/15/072



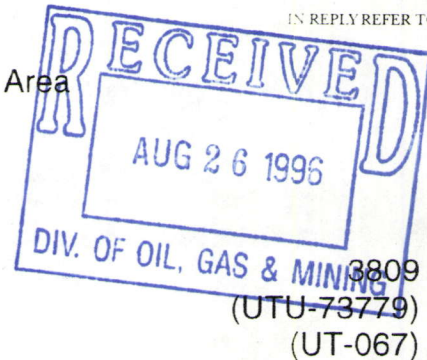
United States Department of the Interior

BUREAU OF LAND MANAGEMENT



IN REPLY REFER TO:

Moab District
Price River/San Rafael Resource Area
125 South 600 West
P.O. Box 7004
Price, Utah 84501



AUG 21 1996

Mr. Fred Mortensen
Western Clay Company
P.O. Box 127
Aurora, Utah 84620

Dear Mr. Mortensen:

We have received and reviewed your plan of operations for expanding your gypsum mine on the Hebe mining claim group in Emery County, Utah. We have found the plan to be incomplete and we require the following information and/or corrections:

1. According to your map, surface-disturbing activities will occur only on the Hebe #1, 2, 4, 5 and 8, not the entire mining group. The plan should address only the mining claims upon which will have surface disturbance due to the operation. The appropriate mining claim serial numbers should also be included.
2. Garrick & Associates are not listed as the mining claimants on the Utah Bureau of Land Management (BLM) mining claim microfiche. The actual mining claimants should be listed as they occur on the location notice, unless the ownership has been assigned to someone else. For multiple mining claimants, a lead mining claimant may be designated, with that address being used for the rest of the mining claimants. All of the mining claimants still need to be listed, however.
3. Location of the proposed activity includes portions of the section in which no surface-disturbing activities are taking place, such as the NW $\frac{1}{4}$ of section 13. Only those areas which have surface disturbance in them should be listed, even if the part of the mining claim is not included in the legal description.
4. No development schedule was included with the plan. The development schedule should include the total number of acres disturbed and the number of years being considered for the mine. Common projections range from 5 to 40 years. The longer term is used for very stable operations in which little change is expected, while operations expecting quite a bit of change in their onground operations usually opt for the shorter time frame.

5. No reclamation schedule was included with the plan. We use five (5) years from the date the reclaimed area is reshaped and seeded to be ready to be released. If you disturb five acres a year for ten years and begin reclaiming two acres per year in the second year, then the first two acres would not be considered to be reclaimed until sometime in the seventh year and would probably be released by year eight.
6. No yearly production rate was included or the total amount of resource expected to be mined in the plan. The production can have an estimated maximum and minimum rate.
7. The number of personnel needed to run the mine was not in the plan. Personnel include mine workers and truck drivers. Workers at the mill may be included. If contractors are being used to perform any work, they should be identified.
8. The size and number of trucks used is needed, as is the number of trips they will make on a daily or weekly basis.
9. The period(s) of time the mine will be in operation should be addressed, and whether it will be operating full-time or part-time. If part-time, then the length of time it will be in operation should be included.
10. All overburden and topsoil stockpiles should be seeded if they are to remain in place for more than a year.
11. Whether contractors are being hired to perform either the cultural and/or threatened or endangered plant inventories should be addressed. If contractors are being used, their names and addresses should be submitted.
12. The areas where topsoil, overburden, and gypsum are going to stockpiles should be designated on the map.
13. The standard to which any access roads are being build should be included in the plan.
14. Any erosion-control measures should be included in the plan, as should any measures for water control.
15. Measures for dust control on the roads should be made part of the plan.
16. The amount of water to be used and the location from which it is obtained is needed.

17. Any proposed mine areas, which do not have identified gypsum reserves, should be explored by drilling before inclusion of the area in the plan of operations. Past experience has shown that mining prior to exploration causes haphazard mining, which results in inefficient mining and submission of many plan amendments.

18. The end uses of the gypsum product and a brief description of the plant and its location should be included in the plan.

19. A justification for the need of the various pits. For instance, due to grade differences, they could have different markets.

20. The existing mine, including disturbed acreage, needs to be included in the plan of operations as part of the area of operations.

21. A list of any hazardous materials to be used in mining should be added to the plan. If there are none use a negative declaration.

22. If any sanitary facilities such as portable toilets are to be situated onsite, it should be mentioned in the plan and the proposed location of the facilities should be shown on the map.

23. The location for storage of any mining equipment, fuel tanks, maintenance equipment, office, and any other equipment or structures should be described and located on a map.

24. A statement to the effect that any spills of petroleum products and/or toxic substances will be cleaned up should be contained within the plan. A housecleaning statement regarding trash should also be in the plan.

25. The thickness of gypsum beds being removed should be addressed. If only part of the bed is to be removed, then the thickness of the minable portion should also be addressed.

26. The route used by the haul trucks should be mentioned, whether it is the Fremont Junction interchange or the Ivie Creek-Muddy Creek interchange. The total haul distance to the plant should be included.

27. The type of blasting agent proposed should be in the plan.

28. A map and description of the specific mining procedures for each pit should be added to the plan. If the mining procedures are the same as the general mining procedures, then they just need to be referenced. Pits having different conditions such as increased overburden should be described as such.

An onsite to examine the proposed expansion, should be held at the earliest opportunity. Please contact Neil A. Simmons of my staff at (801) 636-3639 at your earliest convenience to set up the meeting.

Sincerely,

/S/ DENNIS J. WILLIS

Area Manager

Acting

cc: Bryant Anderson
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